

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO.: 1:20CR440
)	
Plaintiff,)	
v.)	JUDGE SOLOMON OLIVER, JR.
)	
ALLA WITTE,)	<u>DEFENDANT'S MOTION FOR LEAVE</u>
)	<u>TO FILE SENTENCING</u>
Defendant.)	<u>MEMORANDUM UNDER SEAL</u>
)	

Defendant Alla Witte, through undersigned counsel, respectfully requests that this Honorable Court issue an order permitting her to file her Sentencing Memorandum under seal in the above-captioned case. The Sentencing Memorandum contains sensitive and confidential information relating to Ms. Witte that should not be part of the public record. The purpose of this request is to protect the privacy interests of Ms. Witte. Undersigned counsel respectfully submits that the privacy interests of Ms. Witte regarding the matters within the Memorandum override the public's limited interest in access to information about her life.

Respectfully submitted,

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Attorney for Defendant Alla Witte

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Christos N. Georgalis

Christos N. Georgalis

Attorney for Defendant Alla Witte